

## **B. Remarks**

In the above-noted Office Action, claims 1, 2, 8, 13, 14, 16 were rejected under 35 U.S.C. § 102(e) as being anticipated by Hendriksma et al (U.S. 6,591,798). Claims 3 and 15 were rejected under 35 U.S.C. 103 as being unpatentable over Hendriksma. Claims 4, 9 and 10 were rejected under 35 U.S.C. 103(a) as being unpatentable over Hendriksma, in view of Jahr (U.S. 6,318,318). Claims 5-7, 11-12, and 17-20 were rejected under 35 U.S.C. 103(a) as being unpatentable over Hendriksma, in view of Yoeda et al (U.S. 6,405,693). Claim 20 was rejected for the reasons set forth in the rejection of claims 1, 3, 5, 13, 14, and 19.

Applicants submit that Hendriksma, taken singularly or in combination with the other cited references, or combined with legal precedent, fails to teach, disclose, suggest or obviate Applicants' invention as originally filed or previously presented claims.

Specifically, Hendriksma fails to provide a first body with an aperture to facilitate connection of the body to a cylinder head and wherein the first body has a cut out for receivingly mounting a cam shaft. The items 10 or 14 do not have a cut out for receivingly mounting a camshaft, as does Applicants' invention. The items 10 and 14 are not a part typically referred to as the cam shaft bearing ladder.

Applicants request that the Examiner review the marked up copies of Hendriksma. In Figure 3 Hendriksma has a camshaft bearing (with its bearing surface highlighted in pink) noted as item 92. This is Hendriksma's "first body." The bearing 92 is connected to the engine head 94. The bearings do not have any pockets for a solenoid actuator. Hendriksma's arbor 14 does have pockets for solenoids 87 (see Figure 6). The arbor 14 is connected to the engine head 94 (Figure 3). However the arbor 14 does not receivingly mount the camshaft 90 (highlighted in green). Therefore Hendriksma does not meet the limitations of Applicant's independent claims.

In sharp contrast, as shown in Applicants' Figures 2 and 4, the cam shaft bearing ladder or cam shaft bearing cap ladder is referred to as item 210. Applicants' cam shaft bearing ladder 210 receivably mounts two camshafts 267.

The addition of any other references cited by the Examiner fails to bring forth internal combustion engine cylinder head cam shaft bearing ladder having a first body with an aperture to facilitate threaded connection to the cylinder head which additionally has a cut out for receivingly mounting a cam shaft, in addition to having a pocket with a solenoid actuator positioned therein.

Accordingly, the references cited by the Examiner fail to bring forth Applicants' invention as defined in the claims.

Applicants' response to the rejection of the remaining claims is incorporated in Applicants' response to the rejection of claim 1. Therefore, it is not repeated in interest of conservation of the Examiner's valuable time.

By this amendment, Applicants have shown wherein the Examiner's rejections are respectively traversed. As the application is otherwise in condition for allowance, such action is respectfully requested.

Respectfully submitted,



Ernest E. Helms Reg. No. 29,721  
DYKEMA GOSSETT PLLC  
39577 Woodward Avenue, Suite 300  
Bloomfield Hills, MI 48304-2820  
248) 203-0756  
Attorneys for Applicants

Dated: March 23, 2004

BH01\456855.1  
ID\EEHE